

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Norfolk Division

UNITED STATES OF AMERICA,
v.

Criminal Nos. 2:19-cr-47-3

AGHEE WILLIAM SMITH, II
Defendant.

**DEFENDANT SMITH'S MOTION
TO PERMIT USE OF A HOTSPOT DURING TRIAL**

Mr. Smith, through counsel, requests permission to bring necessary equipment and technology into the courtroom for trial. Undersigned counsel will be submitting the standard Request for Authorization to bring electronic devices into the courthouse. In addition, defense counsel seeks to bring a hotspot for internet connection. Counsel understands that we cannot connect to the court internet system, which a hotspot will not do.

Internet connection is necessary for this case because of the volume of documents. The discovery in this case is estimated to be around 1.5 to 2 million pages. No computer hard drive can support discovery that large. Because of that, the Federal Public Defender's Office required us to use an online platform called Casepoint to review discovery. Casepoint is only accessible via internet. The complexity of the case, plus the volume of potential documents, greatly increases the chances of needing a document to impeach or cross that was unexpected. This ability to meaningfully cross examine and put forward a defense, if Mr. Smith so chooses, are protected by the Sixth Amendment of the Constitution. A hotspot would allow counsel to uphold those rights during a lengthy trial.

Counsel can coordinate with the Court's IT department and is prepared to abide by any requirements.

Respectfully submitted,

AGHEE WILLIAM SMITH, II

By: _____/s/ _____

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